



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England Regional Laboratory
Laboratory Services and Applied Science Division
11 Technology Drive, North Chelmsford, MA 01863

Report Memorandum

Drafted Date: March 5, 2021

Finalized Date: March 9, 2021

Subject: Stack Emission Testing Observations
Algonquin Gas Transmission LLC (AGT)

From: William Osbahr, Environmental Engineer /WAO/
Field Services Branch (FSB)

Through: Jerry Keefe, Team Leader /JCK/
FSB

To: Christine Sansevero, Air Technical Unit Chief
Office of Environmental Stewardship

Facility Information

- A. Facility Name: AGT
- B. Facility Location: 54 Bridge Street, Weymouth, MA 02191
- C. Facility Contact: Benjamin Wankum

Background Information

- A. Date of inspection: March 5, 2021
- B. US EPA Representative(s): William Osbahr
- C. Federally Enforceable Requirements Investigated:
 - 40 CFR Part 60 Subpart JJJJ
- D. Units Tested: Emergency Generator 1
- E. Pollutants Tested: CO, NO_x, VOC
- F. AFS # MA0000002511903820

Disclaimer:

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Test Observation Notes

On February 5, 2021, I performed a remote observation of emissions testing at AGT.

Listed below are the following test observations.

Test Participants:

| Name | Company | Role |
|--------------|----------|--------------------------------|
| Evan Bali | Canomara | CEMS operator - Test Team Lead |
| Mike Maraghy | Canomara | GC operator |
| Alex Canora | Canomara | Stack technician |
| Mark Correia | Waukesha | Engine / Generator technician |
| Ben Wankum | AGT | Station Supervisor |
| Jesse Henry | AGT | Electrical / Controls tech. |
| Frank Pike | AGT | Environmental Advisor |

At 8:15, I held a phone call with Mr. Pike.

We switched the format to FaceTime.

In the FaceTime video, we viewed the stack trailer equipment. I was able to see Canomara's analyzers and the data logger read-out live in the video. Mr. Bali of Canomara was operating the monitoring equipment in the stack test trailer.

Outside the trailer, we viewed the umbilical probe, the stack sampling location, and the stack exhaust.

The sample set up and location appeared to be acceptable for the test methods applied for this test.

Mr. Bali proposed a start time of the first run to be 8:20 am, which I agreed on.

At the start of the first run, the stack had the following emissions

200 ppm NO_x @ 7.5 % O₂

300 ppm CO.

Mr. Pike explained that the engine is rated for 585 Bhp which has the capability to run a 436 Kw generator. This gen set does not have a 436 Kw generator. Mr. Pike explained that the generator for this unit only has a rated capacity of 415 Kw. He asked if we would accept 90-100% of 415 Kw as the max

load for this gen set. I stated that that was an acceptable approach and that it would constitute max load for the test.

Mr. Pike agreed videos to me of pertinent portions of the stack testing equipment. We agreed the videos should be 15 seconds or less.

Mr. Pike agreed to send photos of the stack sampling equipment. He agreed to send me photos and videos after the face time call.

Mr. Pike agreed to send emission data from after each run was complete. I specifically asked for 1 hr data, analyzer calibration data, and engine load level data.

I explained that it is acceptable for AGT to continue testing as long as there are no upsets in engine operations or monitoring equipment. I explicitly stated that if the generator has shutdowns or upsets that he should keep me informed of such issues.

At the time of our call he explained that the engine was running steady at max load with no issues.

At 8:28 am Mr. Pike sent me videos of the engine room equipment with the control readout panel.

He sent me a series of photographs of the stack test trailer monitoring equipment.

He sent me photos of the stack sampling meter box, the stack, and the sample location in the breaching,

I explained via text to Mr. Pike that the combination of the photos, videos and FaceTime session displayed an acceptable stack test set up.

Mr. Pike texted me a Run 2 start time of 9:38.

At 10:45 I called Mr. Pike to discuss to discuss the difference between AGT's 6 Bridge St address and 54 Bridge St. He explained the 6 Bridge St is the "Meters and Regulators" site and that the "compressor station" is at 54 Bridge street. He stated that it is all the same company, however.

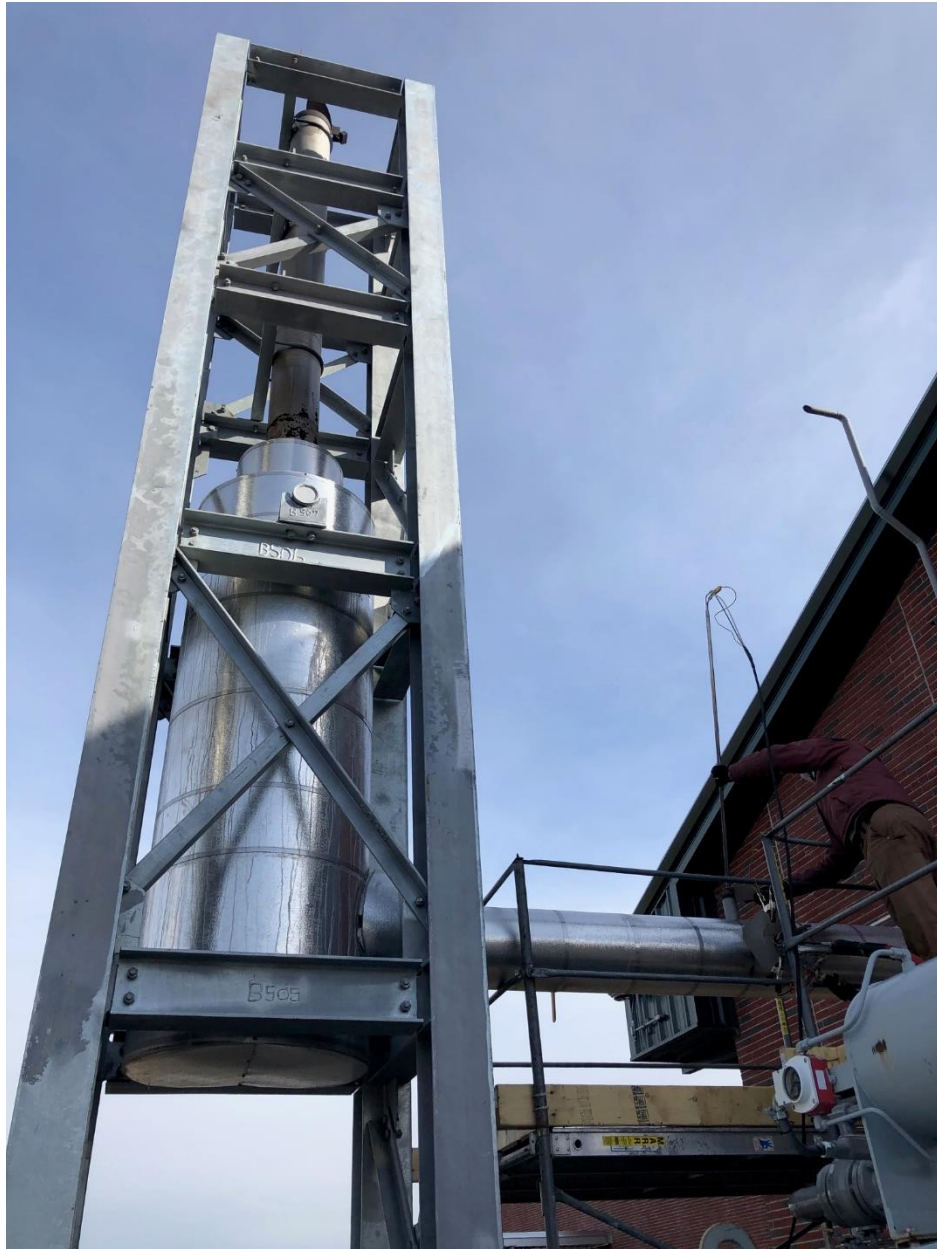
Mr. Pike Texted me a Run 3 start time of 10:52.

Throughout the day Mr. Pike emailed me the run summary data after each run for this test.

Photos of Stack sampling location, Stack exhaust, and Stack test analyzers are included in this report.



AGT Stack Sample Location



AGT Stack Exhaust



AGT Stack Test Trailer Analyzers

